

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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JONG SHIN,

Petitioner

vs.

UNITED STATES OF AMERICA,

Respondent

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The Honorable Renée M. Bumb

Civ. No. 15-7248 (RMB)

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

Ruth M. Liebesman, attorney for Petitioner Jong Shin, moves that she be allowed to withdraw as counsel due to a complete break-down in the relationship between attorney and client. Because I would not add to the Reply Memorandum of Law new issues that I considered invalid, as well as inappropriate for a Reply Memorandum, Ms. Shin “fired” me and asked that I withdraw. She removed me from her Corrlinks contacts, so that I cannot contact her by email. I am informed that she will refuse any visit from me.

Today, I received a copy of Ms. Shin’s correspondence with the Court. I will not address her factual statements about my representation of her due to the attorney-client privilege, except to state that they are categorically untrue.

I request that this Court allow me to withdraw from this representation, and accept for filing Ms. Shin’s *pro se* filing.

I have spoken with Assistant United States Attorney Diana Carrig, Esquire, and she informs me that the Government does not consent to this request.

Respectfully submitted,

/s/ Ruth M. Liebesman

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